

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Allied International Union, an  
unincorporated labor Plaintiff,  
organization,

08 cv 3357 (AKH)

MOTION TO ADMIT COUNSEL

PRO HAC VICE

- against -  
Service Employees  
International Union Defendant.  
Local 32B - 32J et al.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the  
Southern and Eastern Districts of New York, I, Larry Engelstein a member in good standing of  
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: W. Gary Kohlman  
Firm Name: Bredhoff & Kaiser, P.L.L.C.  
Address: 805 Fifteenth Street, NW, Suite 1000  
City/State/Zip: Washington, DC 20005  
Phone Number: (202) 842-2600  
Fax Number: (202) 842-1888

is a member in good standing of the Bar of the States of

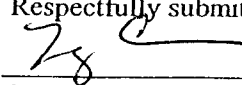
District of Columbia and Maryland

There are no pending disciplinary proceeding against W. Gary Kohlman  
in any State or Federal court.

Dated: May 15<sup>th</sup>, 2008

City, State: New York, NY

Respectfully submitted,

  
Sponsor's

SDNY Bar 0131

Firm Name: Service Employees International Union, Local 32BJ  
Address: 101 Avenue of the Americas 22nd Floor  
City/State/Zip: New York, New York 10013  
Phone Number: 212 - 388-2128  
Fax Number: 212 - 388-3660

RECEIVED  
MAY 15 2008  
CLERK OF COURT

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Allied International Union,

Plaintiffs,

v.

Service Employees International Union  
Local 32BJ, Michael Fishman, Andrew  
Friedman, Niel Diaz, Service Employees  
International Union Local 1877, and  
Service Employees International Union,

Defendants.

Case No.: 08 cv 03357 (AKH)

**DECLARATION OF  
LARRY ENGELSTEIN  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL PRO HAC VICE**

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Larry Engelstein declares as follows:

1. I am General Counsel for Service Employees International Union, Local 32BJ, counsel for Defendants Service Employees International Union Local 32BJ, Michael Fishman, Andrew Friedman, Niel Diaz, and Service Employees International Union Local 1877 in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit W. Gary Kohlman as counsel pro hac vice to represent Defendants Service Employees International Union Local 32BJ, Michael Fishman, Andrew Friedman, Niel Diaz, and Service Employees International Union Local 1877 in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on November 30<sup>th</sup> of 1999. I am also admitted to the Bar of this Court and am in good standing with this court.
3. Mr. Kohlman is a member at Bredhoff & Kaiser P.L.L.C., in Washington, D.C..

4. I believe Mr. Kohlman to be a skilled attorney, a person of integrity, experienced in Federal practice and familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move the admission of W. Gary Kohlman, pro hac vice.
6. I respectfully submit a proposed order granting the admission of W. Gary Kohlman, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit W. Gary Kohlman pro hac vice, to represent Service Employees International Union Local 32BJ, Michael Fishman, Andrew Friedman, Niel Diaz, Service Employees International Union Local 1877 in the above captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct and was executed this 15<sup>th</sup> day of May, 2008, at New York, New York.

  
\_\_\_\_\_  
Larry Engelstein (SS 0131)

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Allied International Union, an  
unincorporated labor Plaintiff,  
organization,

08 cv 3357 (AKH)

- against -  
Service Employees Defendant.  
International Union  
Local 32B-32J et al.

ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION

Upon the motion of Larry Engelstein attorney for Defendants, please see attached,  
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: W. Gary Kohlman

Firm Name: Bredhoff & Kaiser, P.L.L.C.

Address: 805 Fifteenth Street, NW, Suite 1000

City/State/Zip: Washington, DC 20005

Telephone/Fax: (202) 842 - 2600

Email Address: gkohlman@bredhoff.com

is admitted to practice pro hac vice as counsel for please see attached in the above  
captioned case in the United States District Court for the Southern District of New York. All attorneys  
appearing before this Court are subject to the Local Rules of this Court, including the Rules governing  
discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall  
immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice  
fee to the Clerk of Court.

Dated:  
City, State:

United States District/Magistrate Judge

**Attachment to Order for Admission Pro Hac Vice on Written Motion**

Parties represented by Larry Engelstein and W. Gary Kohlman:

- 1) Service Employees International Union, Local 32BJ
- 2) Michael Fishman
- 3) Andrew Friedman
- 4) Niel Diaz
- 5) Service Employees International Union, Local 1877



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

WARREN G. KOHLMAN

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was on the 29<sup>TH</sup> day of AUGUST, 1973

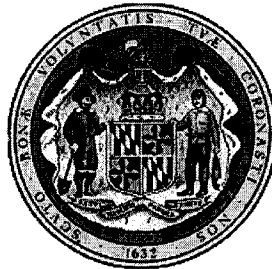
duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on May 12, 2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles  
Deputy Clerk

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the second day of June, 1983,*

**Warren Gary Kohlman**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
thirteenth day of May, 2008.*

*Bessie M. Decker*

*Clerk of the Court of Appeals of Maryland*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Admit Counsel Pro Hac Vice was served, via First Class Mail, on this 16 day of May, 2008, upon the following:

Kevin Michael Hart  
Stark & Stark, P.C.  
P.O. Box 5315  
Princeton, NJ 08543

Service Employees International Union  
1800 Massachusetts Avenue, NW  
Washington, DC 20036



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Larry Engelstein, SS 0131  
Service Employees International Union,  
Local 32BJ  
101 Avenue of the Americas, 22<sup>nd</sup> Floor  
New York, N.Y. 10013